

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh
EPA
Facility
Chron

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 29 December 1994 Time start _____ Time finish _____
Name of Inspector David Leitford
Company, installation name Monessen, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official B. James Burkhardt
Title superintendent
Mailing Address P.O. Box 220 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed none
Title _____
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: none

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. not yet determined kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K087		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 29 December 1994 Identification Number PPD 982 577 082

Company/Facility/Site Name Monessen, Inc.

Inspection conducted with water quality specialist Howard Dunn for the purpose of sampling groundwater well #1, outfall #006 and upstream/downstream points on the Monongahela River for the presence of VOCs.

The only activity observed this date was the continued demolition of the furnishing/caster plant area. An environmental services company, Universal Environmental Services is on site for asbestos removal (asbestos sheeting mainly) from the BOF building.

The drum storage areas inspected included the wire mill, blooming mill, and the open hearth. The open hearth storage area containing drums from Blast Furnaces 1 and 2 had many drums left open with the caps sitting on top of the drums. As the consulting firm CRS had recently conducted sampling of these drums, they will be contacted concerning this violation. This is of particular concern because of the evaporation of hazardous waste solvents; drum #BF142-102 which contained 1-1-1 trichloroethane is now empty.

Drum #BF142-77, which was reported to contain 45 gallons of waste oil produced a volatiles reading of 550 ppm on a field test. Drums of oil containing high volatiles on field tests should not be composited for sampling and future disposal.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailes

Date _____

Inspector (signature) David L. Leifer

Date 29 Dec 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh
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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 12 October 1994 Time start _____ Time finish _____
Name of Inspector David Leitard
Company, installation name Manessen, Inc
Location 345 Donner Ave Manessen, PA 15062
County Westmoreland Municipality Manessen
Identification number PAD 98257082
Name of responsible official B. James Burkhardt
Title Superintendent
Mailing Address P.O. Box 200 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed none
Title _____
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo. not yet determined
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 12 October 1994

Identification Number PAD 932.572082

Company/Facility/Site Name Monessen, Inc.

Inspected this facility for compliance with the consent order and agreement (25 March 1994). The following observations were made. Chester Environmental is in the process of drilling six monitoring wells. Wells MW1, MW2, MW3 and MW5 have been completed as of this date. Drilling fluids and sludges/soil have been retained in 55 gallon drums and are to be analyzed (TCLP) prior to disposal. Sludge from MW2 has a strong odor tentatively identified as coke gas. This well is in the vicinity of the interceptor sump in the coke plant which tested high for benzene (11.3 mg/L).

Dismantling of the Tundish plant continues. Four 55 gallon drums of used gear oil were recovered from a crane today. Four large batteries and approximately 30 loose bags of water treatment chemicals have been removed and store in the B.O.F Shop area. The location of the ten drums removed from this area in late August has not been determined. The interceptor sump (#165) coke plant, has a pump hose leading to the secondary containment for the tar storage tanks (CEN 120). This containment area has a drain pipe next to tar storage tank T-104. It could not be readily determined where this drain discharges to.

Four drums next to the mud tank (CEN 248) in the coke plant have not been labeled. One drum appears to be full of methanol, the three remaining drums are partially full. Contents not identifiable. These drums should be labeled as should the two blue plastic 55 gallon drums (Full) located next to the Equalization basins (Tank T-147).

No discharge observed from outfall #006. The river appears clean. Drum storage areas in the Open Hearth and Blaming Mill appear to have all drums labeled (numerous drums remain uncovered). Several drums in Wire Mill are unlabeled.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed

Date

Inspector (signature) David L. Leifer

Date

12 October 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh
EPA
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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 8/25/94; 8/31/94 Time start _____ Time finish _____
Name of Inspector David Leiford
Company, installation name Monessen, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official R. James Burkhart
Title Superintendent
Mailing Address P.O. Box 220 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed James Burkhart
Title same
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

not determined; inventory incomplete

- a. _____ kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 8/25/94, 8/31/94 Identification Number PAD 982 572082Company/Facility/Site Name Monessen, Inc.

Inspection of the plant conducted on 8/25/94 in order to determine if drums stored in the basic oxygen furnace (BOF) plant had been properly moved and stored in the wire mill storage area in the wire mill has a concrete floor with an apparent solid roof. All leaking drums were placed in overpack drums. All drums appeared to be numbered. Number of drums stored here is approximately 200.

Outfall #006 on 8/25/94 had an oily discharge (flow estimated at 2-3 gpm) that was visibly staining the river. No oil sheen observed upstream of the discharge point.

Inspection of the plant conducted on 8/31/94 in order to determine what wastes remain in the casting/tundish facility that is being dismantled by Cassey Equipment. Ten 55 gallon drums were observed in this part of the plant. It was not determined what these drums contained; they had been staged by Cassey Equipment along with pallets of what appeared to be dated water treatment chemicals. These items along with any other waste material encountered must be included on a revised inventory.

Three hoppers of what appeared to be tar or KOH waste were found on the upriver side of the BOF plant.

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Person interviewed (signature) Monte Date _____Inspector (signature) David L. Leibert Date 1 Sept. 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 19 July 1994 Time start 9:30 a.m. Time finish 12:30 p.m.
Name of Inspector David Leitford
Company, installation name Monessen, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official R. James Burkhardt
Title superintendent
Mailing Address P.O. Box 270 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed James Burkhardt
Title same
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method:

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

not determined as yet; inventory
incomplete

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K087		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B**

Site Name Monessen, Inc. ID Number PA0 982572082 Date 19 July 1994

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
			X	Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
		X		Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
		X		Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
		X		PA manifest used for intrastate shipments	262.20(b)	H005
		X		TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
		X		Manifests filled out properly and completely	262.20(g)	H007
		X		Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
		X		a). All containers of haz. waste in good condition	265.171	H016
		X		b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
		X		d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
		X		h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Records retained at designated location for 20 years	262.40(a)	H026
		X		Quarterly reports submitted to the Department	262.41(a)	H027
		X		Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
			X	Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
			X	Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 19 July 1994Identification Number PAD 98257082Company/Facility/Site Name Monessen, Inc.

Inspection of this facility conducted with Sam Harper, Ed Bates and Tom Buchan, of the environmental clean up program and Stan Whitel, Field Operations supervisor, BWM, and water quality specialist, Howard Dunn. Five samples were taken of various waste sources. They included the interceptor sump adjacent to the wash oil circulating tank, the concrete holding sump containing decanter tar condensate (located next to the light oil loading station, two samples of the yard #3 (liquid and sludge phases), and the cooling water from the cooling tower north of the circulating water pump room. Analysis was for VOCs.

Two additional waste sources previously not identified by Earth Sciences (consultant performing product and waste inventory for C.O.F.A.) were discovered. They are 38 five gallon, rusted buckets (unlabeled) in the firehouse next to the wash oil coolers and the decanter tar in the sump beneath the cooling water cooling tower. These wastes should be included in the waste inventory for the coke plant.

Additionally, samples were taken by WQS Howard Dunn of monitoring well #1 and the cooling water tower accumulation (cyanides).

No activity observed for completing the waste and product inventory although an estimated 150 drums were staged in the booming mill. These drums had an I.D. number crayoned on them. Most appeared to contain waste oils or grease.

The broken wash oil/waste oil line in overhead breezeway between the hoist house and rail line (Blast Furnace #3 Area) remains unrepaired.

Catch bucket at the end of the broken line remains in place. A roll off box container has been brought on site for clean up of the contaminated soil.

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Person interviewed (signature) Mailed

Date

Inspector (signature) David L. Leford

Date

19 July 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
Facility
Chron

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 10 June 1994 Time start 9:00 a.m. Time finish 12:00 noon
Name of Inspector David Leiford
Company, installation name Monessen, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official R. James Burkhardt
Title superintendent
Mailing Address P.O. Box 270 Sharon, PA 16146
Area code and telephone number (412) 684-1005
Name of person interviewed Wes Rager
Title assistant superintendent
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: none at present

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

not determined as yet; inventory incomplete

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K087		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Monessen, Inc. ID Number PAD 982577 082 Date 10 June 1994

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
			X	Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
		X		Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
		X		Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
		X		PA manifest used for intrastate shipments	262.20(b)	H005
		X		TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
		X		Manifests filled out properly and completely	262.20(g)	H007
		X		Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		X		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
		X		a). All containers of haz. waste in good condition	265.171	H016
		X		b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
		X		d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
		X		h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
		X		On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Records retained at designated location for 20 years	262.40(a)	H026
		X		Quarterly reports submitted to the Department	262.41(a)	H027
		X		Exception reporting procedures followed	262.42	H028
				Hazardous waste disposal plan, if required	262.45	H029
			X	Spill reporting procedures followed	262.46(a)	H030
		X		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
			X	Source reduction strategy prepared and available	262.80	H033

INSPECTION REPORT COMMENTS

Inspection of this facility conducted with operations supervisor Stan Carter in order to determine compliance with the consent order and agreement of March 25, 1994. The following observations were made. A crew from CSR (Earth Sciences) was on site preparing 55 gallon drums of waste material for removal/disposal. No labeling/markings on drums for the purpose of inventory was observed. This is in violation of paragraph 10.B. of the C.O.A.

A broken waste oil/wash oil line, running overhead in the breezeway between the hoist base and rail line (Blast Furnace #3 Area) was dripping oil onto the ground. An attempt to cap the ends of the pipe, where a section had been removed was made, however, the bucket placed beneath one end was full and allowing oil to continue to leak onto the ground. This is potentially a violation of paragraph 16 of the C.O.A.

Several hoses from a sump adjacent to the coal tar decanter tank #1 were hooked up and had been recently pumping waste water contaminated with petroleum hydrocarbons (suspected) to the ammonia liquor storage tank. This practice has been ongoing since

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) David L. Leibel Date 10 June 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10 June 1994 Identification Number PAD 982577082

Company/Facility/Site Name Monessen, Inc.

at least December, 1993. The ammonia liquor storage tank is listed on the initial inventory as being empty. This does not appear to be correct. This is a violation of paragraph 10.c.

An inspection of the sump at the Light oil loading dock found this sump to be full. The sump contained approximately 2 ft. of water contaminated with petroleum hydrocarbons and at least 18 inches of sludge/decanter tar. The concrete wall of the sump was cracked on one corner and appeared to be leaking. Failure to include this sump on the initial inventory is a violation of paragraphs 10 A and 12 of the consent order and agreement.

Other problems noted were a leaking 55 gallon plastic drum in the Drum storage area of the tin mill building. The contents could not be readily identified, however, its appearance was blue-green and viscous. The fluid had drained from an apparent puncture hole onto the ground. No containment observed. This material (contaminated ground) must be included on the waste inventory.

Tank #204, is listed as a product on the initial inventory, however, this tank actually is holding a waste oil. This is again a violation of paragraph 10A of the C.O.A.

Finally, tank #13 (202), a H_2SO_4 acid tank is not empty as listed on the inventory but is actually holding an estimated 6-9 inches of acid on the bottom. This is a significant amount, considering it is a 20,000 gallon storage tank. This is also a violation of paragraph 10A of the C.O.A.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) mailed Date _____

Inspector (signature) Daniel L. Feitz Date 10 June 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
Facility
EWA
Chron

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 19 April 1994 Time start _____ Time finish _____
Name of Inspector Paul Lenz
Company, installation name Procter Inc.
Location 345 Procter Ave. Drexel PA 19022
County Delaware Municipality Drexel
Identification number PA 482 577-02
Name of responsible official B. John Bunker
Title Superintendent
Mailing Address PO Box 200 Spring FF 1617
Area code and telephone number (412) 474-1000
Name of person interviewed John Bunker
Title Superintendent
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: RCRA
- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
2. Amount of hazardous waste produced: undetermined; facility remains idle except for salvaging operations
- | | |
|----------|---------|
| a. _____ | kg./mo. |
| b. _____ | kg./yr. |
3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>RCRA</u>		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 19 April 1994 Identification Number PFD 982 577082

Company/Facility/Site Name Moerssen, Inc.

Facility inspected with Theresa Gencik, attorney with the Department and Stan Whitel, operations supervisor with BWM Present during the inspection was Jim Burkhardt, Superintendent.

Only activity occurring at this time are salvaging operations. According to Jim Burkhardt, Earth Sciences Consultants has been contracted to conduct the monitoring testing and report requirements listed in the consent order and agreement issued 25 March 1994. This would satisfy the requirement listed under paragraph #2.

The first progress reports (monthly and quarterly) were due on the 15th of April.

Requirements of the CO#4A due to be completed by 24 May 1994 include the following.

1. Inventory of all above-ground storage units, tanks, etc. associated with on site residual and hazardous wastes.
2. Inventory of all products currently stored on site. Operator should note any products that were not scheduled for use by Nov. 1993 are considered wastes and must be disposed of by 31 Dec 1994.
3. The In-House Inventory and Response Plan for all potential and imminent hazardous conditions at the coke plant.
4. The plan to abate the discharge of hydrocarbon-contaminated groundwater.

During the inspection numerous 55 gallon drums containing oils and or grease were observed to be in extremely poor condition. Operator is required to dispose of all oil contaminated soils at a permitted landfill after the appropriate testing has been performed (i.e. total petroleum hydrocarbons, hazardous waste determination).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date

Inspector (signature) [Signature] Date 25 April 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region
EPA
Facility
Chron

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 30 March 1994 Time start 8:30am Time finish 10:45a.m.
Name of Inspector David Leiford; Howard Dunn, WQS
Company, installation name Monessen, Inc.
Location 345 Dwyer Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official R. James Burkhardt
Title Superintendent
Mailing Address P.O. Box 220 Sharon, PA 16146
Area code and telephone number _____
Name of person interviewed _____
Title _____
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: none
- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced: undetermined; facility remains idle
- a. _____ kg./mo.
- b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>R087</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

cc: Pittsburgh Region
EPA
Facility
Chron
BWQ

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 30 March 1994

Identification Number PAD 982 577 082

Company/Facility/Site Name Monessen, Inc.

Facility inspected with Howard Dunn, water quality specialist. Samples were taken of monitoring well #1 (UWER) and the Monongahela River at cut #1 #006 (oil and grease).

Shipping operations continue with scrap metal being removed for recycling. Acid storage tanks and wash oil tanks were inspected - no leaks observed. The numerous 55 gallon drums containing various products and waste materials that are scattered throughout the plant are generally rusty and deteriorating. Some drums containing grease and oil waste are in danger of falling and should be removed. These drums are located adjacent to ore yard #3 on the south side.

It appears waste waters are still occasionally pumped into ore yard #3. No evidence of compliance with the administrative order requiring an inventory of wastes. Hoppers holding KO89 remain on site, as well as the drums of various wastes previously mentioned have not been numbered; no waste determinations have been performed; no attempt to gather up the asbestos insulation falling from the overhead pipes has been made.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) David L. Leifer

Date

Inspector (signature)

Date

30 March 1994

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

cc: Pittsburgh Region 5
EPA
Facility
Chron

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 30 March 1994 Time start 8:30am Time finish 10:45a.m.
Name of Inspector David Leiford; Howard Dunn, WQS
Company, installation name Monessen, Inc
Location 345 Dwyer Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official R. James Burkhardt
Title Superintendent
Mailing Address P.O. Box 270 Sharon, PA 16146
Area code and telephone number _____
Name of person interviewed _____
Title _____
Mailing address (if different from above) same
Area code and telephone number same

1. Current waste handling method: none

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced: undetermined; facility remains idle

- a. _____ kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>R087</u>		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

cc: Pittsburgh Region 5
EPA
Facility
Chron
BWQ

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 30 March 1994Identification Number PAP 932 577082Company/Facility/Site Name Monessen, Inc.

Facility inspected with Howard Dunn, water quality specialist. Samples were taken of monitoring well #1 (UWER) and the Monongahela River at outfall #106 (oil and grease).

Shipping operations continue with scrap metal being removed for recycling. Acid storage tanks and wash oil tanks were inspected - no leaks observed. The numerous 55 gallon drums containing various products and waste materials that are scattered throughout the plant are generally rusty and deteriorating. Some drums containing grease and oil waste are in danger of falling and should be removed. These drums are located adjacent to ore yard #3 on the south side.

It appears waste waters are still occasionally pumped into ore yard #3. No evidence of compliance with the administrative order requiring an inventory of wastes. Hoppers holding KO87 remain on site, as well as the drums of various wastes previously mentioned have not been numbered. No waste determinations have been performed; no attempt to gather up the asbestos insulation falling from the overhead pipes has been made.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) David L. LeiferDate 30 March 1994Inspector (signature) David L. LeiferDate 30 March 1994

Hazardous Waste Inspection Report
Generators — Part A

Date of inspection 9 February 1994 Time start 9:00 a.m. Time finish 11:15 a.m.
 Name of inspector David Leiford, Howard Dunn, WQS
 Company, installation name Monessen, Inc.
 Location 345 Denner Ave. Monessen, PA 15062
 County Westmoreland Municipality Monessen
 Identification number PAD 982 577082
 Name of responsible official R. James Burkhardt
 Title superintendent
 Mailing address P.O. Box 220 Sharon, PA 16146
 Area code and telephone number (412) 684-1005
 Name of person interviewed James Burkhardt, Bob McCracken
 Title superintendent/maintenance supervisor
 Mailing address (if different from above) same
 Area code and telephone number same

1. Current waste handling method: none

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced: undetermined, no current waste generation

- a. _____ kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

cc: Pittsburgh Region
 Central Office
 EPA 1.4
 BWQ

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9 February 1994 Identification Number PAD 982572082
Company, Installation Name Monessen, Inc.
County Westmoreland Municipality Monessen

Inspection conducted with water quality specialist, Howard Dunn. Findings discussed with maintenance supervisor Bob McCracken.

Facility is coated with ice due to a recent ice storm. Unable to sample outfall #006 due to icy conditions. Oil sheen on the river is still very evident. It appears the oil is coming from the discharge at outfall #006. Oil could be seen on the surface of the water in ground water monitoring wells #1 and #2.

A large above ground tank (later identified by Mr. McCracken as the out of service coke gas storage pressure tank) was observed leaking water from a hole in the side. Flow estimated at 5-10 gpm. Mr. McCracken identified this water as precipitation which had leaked through the cover of the coke gas storage tank. This tank has been out of service for several years according to Mr. McCracken.

A small work crew is continuing salvaging operations on site near the coke gas waste water tank. Only a faint odor from coke oven drippings could be detected today. No reading observed on LEL gas meter.

Wash oil and sulfuric acid tanks appeared stable. No change in the status of the clean-up of on site wastes.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Date _____
Inspector (signature) David L. Laff Date 10 Feb 1994

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type	
P.A.D. 98 2577082		LDF [] TSF [] INC [] LQG [X] SQG [] CEG [] TRA []	
Handler Name		Contact Name	Date Submitted
Monessen, Inc.		R. James Burkhat	02/10/94
Street		City	
345 Donner Ave.		Monessen, PA 15062	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
Date	Number	Agency	Type
02/09/94		3	CEI
Reason	Branch	Person	
		P.A.D.	

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER <input checked="" type="checkbox"/>	GPT <input checked="" type="checkbox"/>	GBF <input type="checkbox"/>	TWD <input type="checkbox"/>	DGS <input type="checkbox"/>	DLT <input type="checkbox"/>	DPB <input type="checkbox"/>	DWP <input type="checkbox"/>
GGR <input checked="" type="checkbox"/>	GRR <input type="checkbox"/>	TGR <input type="checkbox"/>	DCH <input type="checkbox"/>	DGW <input type="checkbox"/>	DMC <input type="checkbox"/>	DPP <input type="checkbox"/>	DBF <input type="checkbox"/>
GLB <input checked="" type="checkbox"/>	GSC <input type="checkbox"/>	TMR <input type="checkbox"/>	DCL <input type="checkbox"/>	DIN <input type="checkbox"/>	DMR <input type="checkbox"/>	DSI <input type="checkbox"/>	CAS <input type="checkbox"/>
GMR <input type="checkbox"/>	GSQ <input type="checkbox"/>	TOR <input type="checkbox"/>	DCP <input type="checkbox"/>	DLB <input type="checkbox"/>	DOR <input type="checkbox"/>	DTR <input type="checkbox"/>	FEA <input type="checkbox"/>
GOR <input checked="" type="checkbox"/>	GEX <input type="checkbox"/>	TRR <input type="checkbox"/>	DFR <input type="checkbox"/>	DLF <input type="checkbox"/>	DOT <input type="checkbox"/>	DTT <input type="checkbox"/>	CSS <input checked="" type="checkbox"/>

Comments: status unchanged. C.O. of 3/16/93 appeared on 9/13/93

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
S	0004	GLB	050692				
S	0007	GGR	050692				

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
Date Determined	Priority	Branch	Person	Returned to Compliance
				Scheduled Actual
Comments				

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
Date Determined	Priority	Branch	Person	Returned to Compliance
				Scheduled Actual
Comments				

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

**Hazardous Waste Inspection Report
Generators - Part A**

Date of inspection 12 January 1994 Time start 0915 Time finish 1345
 Name of inspector David Leiford, Howard Dunn, WQS
 Company, installation name Monessen, Inc.
 Location 345 Denner Ave. Monessen, PA 15062
 County Westmoreland Municipality Monessen
 Identification number PAD 982577082
 Name of responsible official R. James Burkhardt
 Title Superintendent
 Mailing address P.O. Box 220 Sharon, PA 16146
 Area code and telephone number (412) 684-1005
 Name of person interviewed James Burkhardt
 Title same
 Mailing address (if different from above) same
 Area code and telephone number same

1. Current waste handling method:- none

- | | | | | | |
|----|-----------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced: undetermined; no current waste production

- a. _____ kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

cc: Pittsburgh Region
 Central Office
 EPA
 BWQ

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12 January 1994 Identification Number PAD 982572082
Company, Installation Name Monessen, Inc.
County Westmoreland Municipality Monessen

Inspection conducted with Howard Dunn, BWG. Well #2 sampled for oil & grease. Outfall #006 has an oil sheen. A UVT/R analysis is to be made of the river water sheen. The following observations were made.

A heavy snow cover exists on site (1-2 ft.). Salting work continues in the plant with old railroad lines being excavated today. Maintenance work is ongoing to preserve the coke ovens. Sulfuric acid tank #13 (identified in 12/14/93 inspection as having a possible leak) was taken out of service on the weekend of 18 December and repaired with fiberglass patching on 21 December. This tank is currently empty; the acid from it was transferred to tank #14.

The unidentified waste pile on the east side of ore yard #3 has been identified as aluminum sulfate by Tim Burkhardt. According to Mr. Burkhardt, this material was generated when the coke plant was active and is a saleable product as fertilizer.

A strong odor of gas (identified as coke oven gas by maintenance supervisor Bob McGucken) was detected near the coke gas waste water tank (east of the electric shop and Ingot Mold Conditioning Building). The tank was partially covered with a blue-tinted ice coat indicating a possible leak from this point. No other sources were identified, although the extent of the gas odor ranged for approximately 150 ft towards the electric shop. Operator was advised to monitor this area for additional gas contamination.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Date 13 Jan. 1994
Inspector (signature) David L. Leibel Date 12 Jan. 1994

Handler ID Number	Handler Name
PAD902577002	MOWESSEN
VIOLATION	<input type="button" value="Add"/> <input type="button" value="Change"/> <input type="button" value="Delete"/> <input type="button" value="Link to Above Evaluation? (Y/N)"/>

Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Actual <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comments <input type="text"/>					

VIOLATION	<input type="button" value="Add"/> <input type="button" value="Change"/> <input type="button" value="Delete"/> <input type="button" value="Link to Above Evaluation? (Y/N)"/>				
Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Actual <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comments <input type="text"/>					

VIOLATION	<input type="button" value="Add"/> <input type="button" value="Change"/> <input type="button" value="Delete"/> <input type="button" value="Link to Above Evaluation? (Y/N)"/>				
Agency	Number	Area	Class	Regulation Type	Regulation Citation
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> Actual <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comments <input type="text"/>					

ENFORCEMENT	<input checked="" type="button" value="Add"/>	<input type="button" value="Change"/>	<input type="button" value="Delete"/>				
Date	Number	Agency	Type	Branch	Person	Attorney Initials	
080693	<input type="text"/>	5	210	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Penalty Assessed \$			Settled \$				
<input type="text"/>			<input type="text"/>				

POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION			
PPE - Pollution Prevention	<input type="checkbox"/>	EAE - Environmental Auditing	<input type="checkbox"/>
PRE - Pollution Reduction	<input type="checkbox"/>	EPE - Environmental Public Awareness	<input type="checkbox"/>
ERE - Environmental Restoration	<input type="checkbox"/>		

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION							
Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
S	0008	<input type="text"/>	<input type="text"/>	S	0003	<input type="text"/>	<input type="text"/>
S	0007	<input type="text"/>	<input type="text"/>	S	0002	<input type="text"/>	<input type="text"/>
S	0066	<input type="text"/>	<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>
S	0005	<input type="text"/>	<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>
S	0004	<input type="text"/>	<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>

PENALTY PAYMENTS			
Date	Amount	Date	Amount
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comments <input type="text"/>			

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number										Contact Name										RESERVED FOR EPA USE									
Handler Name																													
Street										City																			

UNIVERSE CHANGE

I. Does this facility require a hazardous waste activity change in RCRIS?

YES ____ NO ____

II. Please indicate current RCRIS Universe:

III. Please indicate requested RCRIS Universe:

Generator Status (Mark only one):

LQG [] NON-HANDLER []
SQG [] CLOSED []
CEG []

Transporter Status (Mark here if facility also transports hazardous waste):

TRN []

NOTE:

All TSD activity changes must be handled by the state data coordinator and cannot be made using this form

EVALUATION

Add

Change

Delete

Date	Number	Agency	Type	Reason	Branch	Person
[][][]	[][][]	[]	[][][]	[][][]	[][][]	[][][][][][][]

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER [][][]	GPT [][][]	GBF [][][]	TWD [][][]	DGS [][][]	DLT [][][]	DPB [][][]	DWP [][][]
GGR [][][]	GRR [][][]	TGR [][][]	DCH [][][]	DGW [][][]	DMC [][][]	DPP [][][]	DBF [][][]
GLB [][][]	GSC [][][]	TMR [][][]	DCL [][][]	DIN [][][]	DMR [][][]	DSI [][][]	CAS [][][]
GMR [][][]	GSQ [][][]	TOR [][][]	DCP [][][]	DLB [][][]	DOR [][][]	DTR [][][]	FEA [][][]
GOR [][][]	GEX [][][]	TRR [][][]	DFR [][][]	DLF [][][]	DOT [][][]	DTT [][][]	CSS [][][]

Comments

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
[]	[][][]	[][][]	[][][][][][]	[]	[][][]	[][][]	[][][][][][]
[]	[][][]	[][][]	[][][][][][]	[]	[][][]	[][][]	[][][][][][]
[]	[][][]	[][][]	[][][][][][]	[]	[][][]	[][][]	[][][][][][]
[]	[][][]	[][][]	[][][][][][]	[]	[][][]	[][][]	[][][][][][]
[]	[][][]	[][][]	[][][][][][]	[]	[][][]	[][][]	[][][][][][]

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency	Number	Area	Class	Regulation Type	Regulation Citation
[]	[][][]	[][][]	[]	[][][]	[][][][][][][]
Date Determined	Priority	Branch	Person	Returned to Compliance	
[][][][]	[]	[][][]	[][][][][][]	Scheduled [][][][]	Actual [][][][]

Comments

SPACE FOR ADDITIONAL VIOLATIONS ON REVERSE SIDE

☐ Required ☐ Required If pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

**Hazardous Waste Inspection Report
Generators — Part A**

Date of inspection 14 Dec. 1993 Time start 9:00 a.m. Time finish 12 noon
 Name of inspector David Leiford, Howard Dunn, WQS
 Company, installation name Monessen, Inc.
 Location 345 Donner Ave. Monessen, PA 15062
 County Westmoreland Municipality Monessen
 Identification number PAD 982577082
 Name of responsible official R. James Burkhardt
 Title superintendent
 Mailing address P.O. Box 270 Sharon, PA 16146
 Area code and telephone number (412) 684-1605
 Name of person interviewed none
 Title _____
 Mailing address (if different from above) same
 Area code and telephone number _____

1. Current waste handling method:- none

- | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced: undetermined; no current waste production

- a. _____ kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087</u>		

cc: Pittsburgh Region
 Central Office
 EPA
 Facility

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 14 December 1993 Identification Number PAD 982577082
Company, Installation Name Monessen, Inc.
County Westmoreland Municipality Monessen

Joint inspection of this facility conducted with water quality specialist, Howard Dunn. The following observations were made during this inspection. Outfall #006 on the Monongahela River was discharging at a trickle. River at the outfall had a distinctive oil sheen. Samples of the river and monitoring well #1 were taken for oil and grease analysis. Pictures were taken of the sheen on the river.

Appropriat documentation was made of the following wastes and potential waste sources.

- deteriorating asbestos insulation located throughout the plant.
- dump chute on no. 1 tar decanter (K082)
- storage tank of decanter tar condensate (concrete in-ground tank)
- #13 20,000 gallon storage tank for sulfuric acid; patch appeared to be failing. Tank was approximately $\frac{2}{3}$ full. Maintenance supv. Bob McGraw notified.
- #14 20,000 gallon storage tank for sulfuric acid; discharge pipe on the end appeared to have leaked in the past. Tank approximately $\frac{1}{2}$ full.
- #15 20,000 gallon Fresh oil storage tank
- #16 20,000 gallon storage tank approximately $\frac{1}{2}$ full containing waste and muck oil.
- decanter tar sludge containers left uncovered and not properly disposed.
- caustic soda (NaOH) leaking from brass fittings.
- Undetermined waste pile from a cleanup located on the east side of Fore yard #3.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Date 28 Dec 1993
Inspector (signature) David L. Leifer Date 28 Dec 1993

LDR
TCHazardous Waste Inspection Report
Generators - Part A

Sg 6

7:30 AM
workup

Date of inspection 5-6-92 Time start 10:30 Time finish 3:30

Name of inspector Scott Swarn

Company, installation name Monessen Inc (Subsidiary of Sharon Steel)

Location 345 Dunbar Ave Monessen, PA 15062

County Westmoreland Municipality Monessen

Identification number PAD 982577082

Name of responsible official R. James Burkhardt

Title General Manager

Mailing address Same

Area code and telephone number 412-684-1005

Name of person interviewed R. James Burkhardt

Title Same

Mailing address (if different from above) Same

Area code and telephone number Same

1. Current waste handling method:

- K087
- 2001
- | | | | | |
|---|-------------------------------------|-----------------------------------|--|---|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. > 80,740 lbs/mo kg/mo. JAN 92 - Apr 92
- b. 95,3100 lbs/yr kg/yr. JAN 91 - Dec 91

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
(6) Drums D001/2039	150 Allenbell Drive Johnstown PA 15904	PAD 981736143 Solid Waste
K089	AKT Inc 14 North Washington ST EASTON, MD 21601 301-822-0100	Sprayed Back onto coal prior to processing

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed

2—Not Applicable

3—Not Determined

4—Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		
			✓	Hazardous waste determination, copies available TC Rule oil	11- § 262.
✓				Identification number	12 (a)(b)(c)
✓				Hazardous waste shipments offered only to licensed transporters (Safety Kren)	12 (d)
✓				Authorization received from TSD facility for wastes shipped off-site	13
✓				PA manifest used for intrastate shipments	20 (b)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	20 (c) (d)
✓				Manifests filled out properly and completely	20 (e) (g)
✓				Manifests routed properly and within time limits (7 days)	23 (e) (f)
✓				Proper U.S. DOT shipping containers or packages	30 (1)
	✓			Shipping containers marked and labeled according to U.S. DOT NO DATA on site	30 (2)
			✓	Containers of 110 gal. or less marked with required PA label (KOB7 Hoppers)	30 (3)
✓				Placards offered to transporter	33
✓				Wastes accumulated on-site for less than 90 days	34 (a) (1)
			✓	Wastes stored in proper containers and properly marked and labeled KOB7 Hoppers	34 (a) (2)
			✓	Containers managed in accordance with 265.171 - 178 KOB7 Hoppers	34 (a) (3)
✓				Containers clearly marked with accumulation date and visible for inspection	34 (a) (4)
		✓		Records retained at designated location for 20 years	40
		✓		Quarterly reports submitted to the Department	41
		✓		Exception reporting procedures followed	42, 55
	✓			Hazardous waste disposal plan, if required	45
		✓		Spill reporting procedures followed	46 (a)
			✓	Preparedness, Prevention and Contingency Plan and implemented NOT NOT Adequate	46 (e)
	✓			Special requirements followed for international shipments	50, 53
		✓		On the job or classroom personnel training program [265.16]	34 (a) (5)
		✓		Drum accumulation area inspected weekly as per [265.174]	34 (a) (3)

Hazardous Waste Inspection Report
TSD Facilities — Storage (Containers)

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	Chapter Citation
Status				REQUIREMENT		Subchapter I. § 265	
1	2	3	4				
			✓	Containers managed to prevent leaks and spills. <i>K087 typers</i>		171, 173 (b)	
✓				Containers are compatible with waste stored.		172	
			✓	Containers are closed during storage. <i>K087 A&S Area</i>		173 (a)	
	✓			Container storage area inspected weekly for leaks, deterioration, etc.		174	
	✓			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.		176	
✓				Satisfactory procedures followed for handling incompatible wastes.		177 (a)(b)	
✓				Incompatible wastes separated or protected from other materials.		177 (c)	
			✓	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.		178 (a)	
			✓	Containment system has impervious base free of cracks. <i>(completely covered)</i>		178 (a) (1)	
			✓	Efficient drainage provided from base to sump or collection system.		178 (a) (2)	
			✓	Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.		178 (a) (3)	
			✓	Run-on into containment system prevented.		178 (b)	
			✓	Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.		178 (c)	
			✓	At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.		178 (d)	
	✓			Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).		178 (e) (1)	
		✓		Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).		178 (e) (2)	
✓				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.		178 (e) (2)	
✓				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).		178 (e) (3)	
			✓	Containers labeled to accurately identify hazardous waste contained.		Act 97 Section 403 (b) (2)	

Hazardous Waste Inspection Report
TSD Facilities — Storage (Tanks)

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				R E Q U I R E M E N T										Chapter Citation	
1	2	3	4	Subchapter J.										§ 265.	
		✓		Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.										194 (a)	
		✓		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.										194 (b)	
		✓		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.										194 (c)	
		✓		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.										194 (c)	
		✓		Continuously fed tanks equipped with a means to stop the inflow.										194 (d)	
		✓		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.										193	
		✓		Monitoring equipment data inspected once each operating day.										195 (2)	
		✓		Liquid level of tanks inspected once each operating day.										195 (3)	
		✓		Construction materials of tanks inspected weekly.										195 (4)	
		✓		Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.										195 (5)	
		✓		All hazardous waste removed from tanks and related appurtenances at closure.										197	
		✓		Placement of ignitable or reactive waste only with the Department's approval.										198 (a)	
		✓		Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.										198 (b)	
		✓		Precautions taken for handling ignitable, reactive or incompatible waste or materials.										199	
		✓		Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.										194 (e)	
		✓		Discharge control equipment inspected once each operating day.										195 (1)	
		✓		Tanks labeled to accurately identify hazardous waste contained.										Act 97 Section 403(b)(2)	

Hazardous Waste Inspection Report
TSD Facilities — Chemical, Physical, & Biological Treatment

Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4	Subchapter Q.			§ 265.
		✓		Precautions taken for treating ignitable, reactive, or incompatible waste or material.			401 (a)
		✓		Treatment process or equipment managed to prevent leaks, rupture, corrosion, or otherwise failing.			401 (b)
		✓		Continuously fed treatment process or equipment equipped with a means to stop in flow.			401 (c)
		✓		Waste analysis and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated in that process or equipment; or chemically treat hazardous waste with a substantially different process than any previously used in that process or equipment.			402
		✓		Discharge control and safety equipment inspected once each operation day.			403 (1)
		✓		Monitoring equipment data inspected once each operating day.			403 (2)
		✓		Construction materials of treatment process or equipment inspected weekly.			403 (3)
		✓		Construction materials or discharge confinement structure and area immediately surrounding inspected weekly.			403 (4)
		✓		Closure and post-closure requirements are complied with.			404
		✓		Precautions taken for handling reactive, ignitable, or incompatible wastes or materials.			405, 406
		✓					
		✓		PERMIT BY RULE REQUIREMENTS			
		✓		Captive facility and only waste treated is generated on site			433 (1)
		✓		Facility has NPDES permit, if required, and is in compliance			433 (2)
		✓		Facility complies with the following sections of Chapter 264 and 265			433 (3)
		✓		Facility has a preparedness and prevention system			Subchap. C.
		✓		Facility has an approved PPC Plan			Subchap. D.
		✓		Facility complies with treatment requirements			Subchap. Q.
		✓					§264.
		✓		Facility has an identification number			11
		✓		Facility has adequate security			14
		✓		Facility meets general inspection and construction inspection requirements			15
		✓		Facility has required operating records			73
		✓		Facility submits required quarterly reports			75
		✓		Facility submits required annual reports			77

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
1	2	3	4			
				Generators		
✓				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
✓				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
✓				Dilution not used as a substitute for treatment.		3
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
✓				Dilution not used as a substitute for treatment.		3
✓				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
	✓			Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection: May 6, 1992 **Identification Number:** PAD982577082
Company, Installation Name: Monessen, Inc.
County: Westmoreland **Municipality:** Monessen boro

This inspection was conducted by Scott Swarm and Richard Burkhart on May 6, 1992. The following observations were made during this inspection:

The main purpose of this inspection was to evaluate the facility for compliance as a generator of hazardous waste and to investigate the presents of a large liquid filled ore pit. According to Mr. Burkhart aside from the K087 and D001 (Safety Kleen solvent) only municipal waste from the lunch area is produced at the site, however, a number of by-products are generated which are sold or recycled back into the processes.

A records review revealed Monessen Incorp. notified as a generator of hazardous waste on 6/13/89. This notification was identified as the first notification and indicated that only D001 hazardous waste was being produced. A subsequent notification should be filed noting that at least one other hazardous waste, coal decanter tar sludge (K087), is generated at the site and that this material is recycled back into the process on site (recycle, reuse, reclaim notification).

The PPC plan currently on file at the site is inadequate and should be updated. A guideline for the completion of this plan has been included with this report. This plan should be completed and forwarded to the Greensburg District Office for review within the next 30 days.

Manifests for the disposal of the D001 (Safety Kleen solvent) appeared to be complete, however records for the recycling of the K087 could not be obtained on this date. These records where forwarded the following day, but should be accessible at the site on any date.

As of this date no Annual Reports detailing the recycling of the K087 or Quarterly Reports for the D001 disposal have been submitted to the Department. Copies of these forms have been included with this report.

Numerous drums were observed strewn about the site. Several of these drums were observed near the K087 recycling area. According to Mr. Burkhart these drums contain predominately waste oils which date back as far as 1988. The oil was being collected and consolidated in a tank at this location, then sprayed back onto the pulverized coal prior to baking. No waste determination for this waste oil was available at the time of this inspection. The spraying back of waste oil at this site should be ceased until a waste determination has been conducted on the oil. Newly generated waste oil from around the plant is storage in tank #16. Tank #16 was also used to store the waste oil that was separated from the groundwater pumped from two pits excavated near the river. These pits were dug in an attempt to identify the source of a

large oil seep entering the Youghiogheny river. No waste determination was available for the waste oil stored in tank #16. This waste is picked up for recycling by Liquix.

During this inspection a large number of tanks were also observed around the site. Please provide this author with a inventory of the drums and tanks on site. This inventory should detail whether the tanks are in service or out of service, whether the tanks/drums are full or empty. Waste determinations should be provided to support the classifying of any waste materials that are discovered. Underground tanks should also be included in this inventory.

Additional tank and treatment section violations may exist once the tank inventory information is examined.

Hazardous waste (K087) in the AKJ mixing and spray back area was found in uncovered and unlabeled containers (hoppers <110 gal). Hoppers of hazardous waste (K087) were also found stored near the decanter tar tanks without proper secondary containment.

Hazardous waste (K087) has been spilled around the coal decanter tar tanks. This material should be immediately cleaned up and recycled or disposed. Proper secondary containment should then be provided in this area.

Excess "flushing liquid" (waste) is currently held in a large tank at the end of the site (12th street). This waste is run through the NPDES water treatment system. No waste determination was available for this material. In the event this material is determined to be hazardous proper labeling and secondary containment would be needed on and around the storage tank at 12th street. A waste determination for this material should be provided to the Greensburg District Office within 30 days

Wastes at various stages of treatment destined for and from the ammonia still have been discharge to an old ore pit located at this site. These wastes have been stored in this pit in excess of one year. An analysis of this waste by Monessen Inc. revealed a pyridine concentration in excess of the 5.0 mg/l TCLP limit. a explanation detailing how this waste was generated and how the company intends to address it should be provided to this office within ten days.

VIOLATIONS:

1. Monessen, Incorporated stored (K087) hazardous waste without first properly notifying in violation of 25 PA Code, Section 261.6(b)(1) cross referencing 25 PA Code, Section 261.41(b)(3). This is also a violation of Act 97, Section 401(a), 403(b)(9).
2. Waste determinations were not conducted and are not maintained on site for waste oils collected and consolidated from around the site for spray back or waste oils collected and stored in tank #16 or for

excess flushing liquid discharged through the NPDES system. The failure to conduct waste determinations constitutes a violation of 25 PA Code, Section 262.11(a) and Act 97, Section 403(b)(9).

3. According to James Burkhart, many of the waste oils mentioned in item #2 were described as dating back to 1988. The storage of waste in excess of one year constitutes disposal under Act 97, Section 104. Due to the fact that the company has no permit for the disposal of residual waste this disposal constitutes a violation of Act 97, Sections 501(a), 301, 302(a), 610(1),(2),(4) and (9).
4. Hoppers containing (K087) hazardous waste were found in both the AKJ treatment area and near the coal decanter tar tanks unlabeled or illegibly labeled and uncovered. This is considered a violations of 25 PA Code, Section 262.34(a)(2) and 262.34(a)(3) which cross references 265.173. This is also a violation of Act 97, Section 403(b)(3).
5. Partially filled hoppers of (K087) hazardous waste near the coal decanter tar tanks were found without proper secondary containment in violation of 25 PA Code, Section 262.34(a)(3) cross referencing 265.178. This is also a violation of Act 97 Section 403(b)(9).
6. Monessen, Incorporated failed to cleanup spilled (K087) hazardous waste around the coal decanter tar tanks in violation of 25 PA Code, Section 262.46(a) and in accordance with the existing PPC Plan. This also violates Act 97, Section 403(b)(10).
7. Monessen, Incorporated failed to submit Quarterly Reports for the disposal of D001 hazardous waste in violation of 25 PA Code, Section 262.41(a) and also failed to submit an Annual Report for the recycled (K087) hazardous waste in violation of 25 PA Code, Section 262.41(b) which cross references 265.77(b). This is also a violation of Act 97, Section 403(b)(7).
8. Monessen, Incorporated has stored ammonia still waste in an ore pit in excess of one (1) year. As previously stated this constitutes disposal and is a violation of Act 97, Sections 501(a), 301, 302(a), 610(1),(2),(4) and (9).

LAND BAN DISPOSAL COMMENTS

This site handles and disposes of regulated wastes. Shipments of waste seem to conform with the LDR regulations (cert./notif. attached), however the disposal of waste exceeding the TCLP concentration for pyridine is currently being investigated.

This inspection report is official notification that a representative of the Department of Environmental resources Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during this inspection are indicated. Violations may also be discovered upon examination of the

laboratory analyses and review of Department records. Notification will forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed(signature) MAILED Date _____
Inspectors(signature) H Scott Swann Date 6-15-92

ATTACHMENTS:

RPL GUIDELINES

SS

SSA

ANNUAL REPORT FORM

TC LP TABLE

Land Disposal Reductions Insp
TC Rule

Hazardous Waste Inspection Report
Generators - Part A

596

Plus 2 hrs.
write up

Date of inspection 9-26-91 Time start 11:00 AM Time finish 3:00 pm

Name of inspector SCOTT SWARM

Company, installation name MORASSEN Inc (Sharon Steel subsidiary)

Location 345 DONNER AVE MORASSEN PA 15062

County WEST MORELAND Municipality MORASSEN

Identification number PAD 982 577 082

Name of responsible official RJ BURKHART

Title General manager

Mailing address Same

Area code and telephone number 412-684-1000

Name of person interviewed RICHARD HERMAN

Title Director (Environmental Control)

Mailing address (if different from above) P.O. Box 291 Sharon PA 16146

Area code and telephone number 412-983-6330

1. Current waste handling method:

- | | | | | |
|--|--|-----------------------------------|--|----------------------------------|
| a. <input checked="" type="checkbox"/> On-site | <input checked="" type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 2 26,000 lbs / wk ~~kg/yr~~
- b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K087	Sprayed back onto coal Prior to processing by "AKJ"	AKJ, Inc. 14 North Washington St. EASTON, MD 21601 301-822-0100
D001	Safety Klean	

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection: Sept. 26, 1991 **Identification Number:** PAD982577082
Company, Installation Name: Monessen, Inc.
County: Westmoreland **Municipality:** Monessen boro

This inspection was conducted by Scott Swarm, Richard Burkhart and Richard Herman on Sept. 26, 1991. The following observations were made during the inspection:

The main purpose of this inspection was to evaluate the status of the facility and to investigate the presents of a large liquid filled ore pit. According to Mr. Burkhart only municipal waste from the lunch area and a small amount of demolition waste is produced and disposed of from the site. All other materials generated are sold or recycled back into the processes. According to Mr. John Belich approximately 21000 lbs of K087 are produced, processed and sprayed back each week. This quantity of waste production makes Monessen, Inc a generator of hazardous waste not a small quantity generator as presently reported. In addition to the K087 produced a small amount of D001 produced in parts washers is also generated. Please note that Monessen, Inc must comply with all existing hazardous waste regulations. Additionally Monessen should notify as a generator of K087 and D001 and as a recycle, reuse, reclaim facility for the K087.

A complete RCRA inspection will be conducted in the near future to evaluate Monessen for compliance with the appropriate sections. Attached you will find an updated MSDS for the mixing solvent used by AKJ. The one previously supplied by Richard Herman was completely outdated.

The analysis supplied on the ore pit was inadequate to serve as a waste determination, please treat this material as an unknown and provide this office with a sufficiently detailed analysis to permit disposal options to be evaluated.

VIOLATIONS:

1) Title 25 Chapter 261.41(b)(3) specifies that no identified or listed hazardous waste may be transported, stored, treated or disposed of unless notification has been given.

LAND BAN DISPOSAL COMMENTS

This site ships only D001 off site for reclamation and recycles all K087 produced back into the process.

This inspection report is official notification that a representative of the Department of Environmental resources Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during this inspection are indicated. Violations may also be discovered upon examination of the laboratory analyses and review of Department records. Notification will forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed(signature) MAILED Date 10-14-91
Inspectors(signature) [Signature] Date _____

MAROC, INC.
INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL
SAFETY DATA SHEET

Trade Name and Synonyms**MAROC P/C BLEND****Manufacturer's Name****MAROC, INC.****Emergency Telephone No.****(301) 822-0100****Address****14 N. WASHINGTON STREET, EASTON, MD 21601****Chemical Name and/or Family or Description****AROMATIC HYDROCARBON****THIS PRODUCT IS CLASSIFIED AS:****X CARCINOGENIC BY OSHA, IARC, OR NTP NOT CARCINOGENIC****WARNING STATEMENT:****WARNING1 CAUSES IRRITATION TO EYES****MAY CAUSE IRRITATION TO SKIN****MAY BE HARMFUL TO SKIN OR IF INHALED****COMBUSTIBLE****OCCUPATIONAL CONTROL PROCEDURES****PROTECTIVE EQUIPMENT (TYPE)****Eyes:** Chemical type goggles must be worn. Do not wear contact lenses.**Skin:** Protective clothing such as uniforms, coveralls or lab coats should be worn. Launder or dry clean when soiled.
Destroy contaminated shoes. (See additional comments, p.6) Gloves resistant to chemicals and petroleum distillates required.**Inhalation:** If vapor, mist or dust is generated in excess of permissible concentrations (see pg.4) use respirator approved by MSHA or NIOSH.**Ventilation:** Local exhaust ventilation recommended**Permissible Concentrations:****Air:** None established**EMERGENCY AND FIRST AID PROCEDURES****FIRST AID****Eyes:** Flush thoroughly with water for at least fifteen minutes. Get medical attention.**Skin:** Wash exposed areas with soap and water.**Ingestion:** Do NOT induce vomiting. May cause chemical pneumonitis.**Inhalation:** Should symptoms noted under physiological effects occur, remove to fresh air. If not breathing, apply artificial respiration.**Other Instructions:** None.**N.D. - Not Determined**
< - Less Than**N.A. - Not Applicable**
> - Greater Than

PHYSIOLOGICAL EFFECTS

Code

No. 75717

EFFECTS OF EXPOSURE

Acute:

Eyes: Believed to cause moderate eye irritation.

Skin: Believed to be moderately irritating: Believed to cause redness, edema or drying of the skin.

Respiratory System: May cause irritation of upper respiratory tract. Symptoms include headache, drowsiness, weakness and dizziness.

Chronic: This product is a complex mixture of aromatic hydrocarbons, including polynuclear aromatic compounds (PNAs). These compounds and mixtures of the type described have caused cancer in laboratory animals by oral, dermal and/or inhalation routes of exposure.

Other: —

Sensitization Properties:

Skin: Yes _____ No _____ Unknown XRespiratory: Yes _____ No _____ Unknown XMedian Lethal Dose (LD₅₀ LC₅₀)(Species)

Oral Believed to be 2-5 g/kg (rat); slightly toxic

Inhalation N.D.

Dermal Believed to be > 3 g/kg (rabbit); practically non-toxic

Other N.D.

Irritation Index, Estimation of Irritation (Species)

Skin Believed to be > 3.0-5.0/8.0 (rabbit); moderately irritating

Eyes Believed to be > 25-50/110 (rabbit); moderately irritating

Symptoms of Exposure See Additional Comments pg.6

FIRE PROTECTION INFORMATION

Ignition Temp. °F N.D.Flash Point °F. (Method) 198 FFlammable Limits (%) Lower N.D.Upper N.D.

Products Evolved When Subjected to Heat or Combustion:

Carbon monoxide and carbon dioxide may be formed on burning in limited air supply.

Recommended Fire Extinguishing Agents And Special Procedures:

According to the National Fire Protection Guide 49, combustible liquid fires may be extinguished by water spray, dry chemical, foam or carbon dioxide. Use water to keep fire-exposed containers cool. If a leak or spill has not ignited, use water spray to disperse the vapors and to provide protection for persons attempting to stop the leak.

Unusual or Explosive Hazards:

None.

N.D. - Not Determined

N.A. - Not Applicable

< - Less Than

> - Greater Than

ENVIRONMENTAL PROTECTION

Code
No. 75717

Waste Disposal Method

Under RCRA, it is the responsibility of the user of products to determine, at the time of disposal, whether product meets RCRA criteria for hazardous waste. This is because product uses, transformations, mixtures, processes, etc. may render the resulting material hazardous (See Remarks for Waste Classification.)

Procedures in Case of Breakage or Leakage:

Avoid all personal contact. Ventilate area. Avoid breathing vapor. Use self-contained breathing apparatus or supplied-air mask for large spills in confined area. Contain spill if possible. Wipe up or absorb on suitable material and shovel up.

Remarks

Waste Classification: Product has been evaluated for RCRA characteristics and does not meet criteria of a hazardous waste if discarded in its purchased form.

PRECAUTIONS

WARNING! CAUSES IRRITATION TO EYES
MAY CAUSE IRRITATION TO SKIN
MAY BE HARMFUL TO SKIN OR IF INHALED
COMBUSTIBLE

THIS PRODUCT CONTAINS COMPONENTS THAT HAVE CAUSED CANCER IN LABORATORY ANIMALS. Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist. Keep away from heat and flame. If contact is unavoidable, wear oil-impervious clothing. Wash thoroughly after handling. Respiratory protection should also be worn if exposed to mist or aerosol

Requirements for Transportation, Handling and Storage:

Store away from heat and open flame. Placard required only when material is contained in packaging or container that exceeds 110 gallons, or in tank car or tank truck. Transport, handle and store in accordance with OSHA Regulation 1910.106 and applicable DOT regulations.

DOT Proper Shipping Name
DOT Hazard Class (if applicable):

See additional comments
Combustible liquid UN 1255 RQ

CHEMICAL AND PHYSICAL PROPERTIES

Boiling Point (°F)	416-627	Vapor Pressure	0.3 @ 100	(mmHg)
Specific Gravity	0.9790 (H ₂ O = 1)	Vapor Density	> 1.0	(Air = 1)
Appearance and Odor	straw colored with aromatic odor			
pH of undiluted product	N.A.	Solubility	insol.	
Percent Volatile by Volume	100	Evaporation	N.D.	() = 1
Viscosity	N.D.	Other	—	

Hazardous Polymerizations Occur ☒ Do not occur

The material Reacts Violently With: (If others is checked below, see additional comments on page 6 for further details)

Air	Water	Heat	Strong Oxidizers	Others	None of These
			X		

N.D. - Not Determined
Less Than

N.A. - Not Applicable
Greater Than

COMPOSITION				Code No. 75717
Chemical/Common Name	CAS No.	Exposure Limit	Range in %	
*Naphthalene	91203	10ppm, TWA-ACGIH 10ppm TWA-OSHA 15ppm STEL-OSHA 15ppm STEL-ACGIH	11.00 - 19.99	
Catalytic reformer fractionator petroleum residues	64741679	5mg/m ³ ACGIH (MIST) 5mg/m ³ OSHA (MIST) 10mg/m ³ STEL (MIST)	80.00 - 94.99	
*Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.				
SARA TITLE III				
I. Title III Section 302/304 Extremely Hazardous Substance				
Component	CAS No.	%	RQ (Lbs.)	TPQ (Lbs.)
NONE				
II. CERCLA Section 102(a) Hazardous Substance				
Component	CAS No.	%	RQ (Lbs.)	
Naphthalene	91203	11.0-19.99	100	
III. Title III Section 311 Hazard Categorization				
Acute	Chronic	Fire	Pressure	Reactive
x	x	x	Not Applicable	
IV. Title III Section 313 Toxic Chemicals				
Component	CAS No.	%		
Naphthalene	91203	11.0-19.99		

PRODUCT SHIPPING LABEL

Code
No. 75717

MAROC P/C BLEND

WARNING! CAUSES IRRITATION TO EYES
MAY CAUSE IRRITATION TO SKIN
MAY BE HARMFUL TO SKIN OR IF INHALED
COMBUSTIBLE

THIS PRODUCT CONTAINS COMPONENTS THAT HAVE CAUSED CANCER IN LABORATORY ANIMALS. Avoid contact with eyes, skin and clothing. Avoid breathing vapor or mist. Keep away from heat and flame. If contact is unavoidable, wear oil-impervious clothing. Wash thoroughly after handling. Respiratory protection should also be worn if exposed to mist or aerosol.

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a doctor. If swallowed do not induce vomiting. Call a doctor immediately. Wash skin with soap and plenty of water.

In case of fire use water spray, foam, dry chemical or CO₂.

Chemical/Common Name	CAS No.	Range in %
*Naphthalene	91203	11.00 - 19.99
Catalytic reformer fractionator petroleum residues	64741679	80.00 - 94.99

*Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.

	HMIS	
Health :	2	Reactivity: 0
Flammability:	2	Special : —

DOT Proper Shipping Name : See additional comments
DOT Hazardous Class : Combustible liquid UN 1255 RQ

CAUTION: Misuse of empty containers can be hazardous. Empty containers can be hazardous if used to store toxic, flammable, or reactive materials. Cutting or welding of empty containers might cause fire, explosion or toxic fumes from residues. Do not pressurize or expose to open flame or heat. Keep container closed and drum bungs in place.

HEALTH EMERGENCY TELEPHONE (301) 822-0100

MAROC, INC.
14 N. WASHINGTON STREET
EASTON, MD 21601

ADDITIONAL COMMENTS

Code
No. 75717

STATE OF MICHIGAN CRITICAL MATERIALS ACT (REVISED 1989)
No critical materials present

This product is a complex mixture of aromatic hydrocarbons, including polynuclear aromatic compounds (PNAs). These compounds and mixtures of the type described have caused cancer in laboratory animals. DO NOT USE THIS PRODUCT IN SPRAY APPLICATIONS. For other uses, contact with this product without the personal protective equipment specified in the Occupational Control Procedures section (page 1) should be avoided.

This product also contains naphthalene which has been shown to cause cataracts in laboratory animals upon systemic exposure

DOT Proper Shipping Name: Petroleum naphtha (contains naphthalene)

To determine applicability or effect of any law or regulation with respect to the product, users should consult his legal advisor or the appropriate government agency. Maroc, Inc. does not undertake to furnish advice on such matters.

N.D. - Not Determined
< - Less Than

N.A. - Not Applicable
> - Greater Than

Hazardous Waste Inspection Report
Generators - Part ADate of inspection June 12, 1990 Time start _____ Time finish _____Name of inspector Scott SwaenCompany, installation name Monessen Inc. (a subsidiary of Sharon Steel)Location 345 Donner Ave Monessen, PA 15062County Westmoreland Municipality MonessenIdentification number PAD 982 577 002Name of responsible official R.J. BurkhardtTitle General ManagerMailing address SameArea code and telephone number 412-684-1000Name of person interviewed Jim Burkhardt & Tom KellnerTitle Gen Manager / Human ResourcesMailing address (if different from above) SameArea code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
- b. ☒ On-site ☒ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
- d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

a. Not Determined kg./mo.

b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>D601</u>	<u>Safety Room</u>	<u>Johnstown PA - Recycle</u>
<u>K001</u>	<u>A.K.J.</u>	<u>Clinton PA - use</u>

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection June 12, 1990 Identification Number PAD 992 577 0821
Company, Installation Name 345 Domeer Ave Monessen, PA 15062
County Westmoreland Municipality Monessen

This inspection was conducted by Scott Suben
on June 12, 1990.

Currently All coke (and Decatur the waste) is
being Sprayed back following Thinning by A.K.T. Corp.
This process is done on site. An air quality
Approval exist for emissions created by this process.

The only waste shipped off site is the degreaser
sol. Being recycled by Safety Chem.

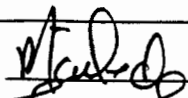
Land Ban Inspection Comments

1) Restrictions on D001 have not been
implemented - Aug 1990

* A Notification of Banful Recycle Permit
MUST be filed with the Department

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)



Date

6/18/90

Inspector (signature)



Date

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

[illegible]

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

[illegible]

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☒ 4. Toxic
(DOOO)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

John R. Bass

CLERK

3-30-89



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY**
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+

PAD982577082

INSTALLATION ADDRESS

BASS, JOHN CLK
MONESSEN INC
345 DONNER AVE
MONESSEN PA 15062

345 DONNER AVE
MONESSEN PA 15062